DRAFT

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of	)	
	)	
Application by SBC Communications Inc.,	)	
Illinois Bell Telephone Company d/b/a	)	
Ameritech Illinois, And Southwestern	)	CC Docket No.
Bell Communications Services, Inc. d/b/a	)	
Ameritech Long Distance for Provision of	)	
In-Region InterLATA Services in Illinois	)	

AFFIDAVIT OF PATRICK L. FOSTER
ON BEHALF OF AMERITECH

STATE OF ILLINOIS	**)**	
	)	
COUNTY OF COOK	**)**	

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NETWORK PROVISIONING OF SPECIAL SERVICES

I, Patrick L. Foster, being of lawful age and duly sworn upon my oath, do hereby depose and state as follows:

1. My name is Patrick L. Foster. My business address is 2000 W. Ameritech Center Drive, Hoffman Estates, Illinois 60196. I am the Director of Operations Support for Special Services in the Network Services Unit (the "Network Services Organization") of Ameritech Illinois ("Ameritech"). I am responsible for monitoring the provisioning activities related to interconnection services for CLEC (Competitive Local Exchange Carrier) customers for special services. These include the high capacity DS1 and DS3 circuits that link CLEC switches with Ameritech switches. I also lead the team of Network Project Managers who oversee the provisioning of large projects of high capacity services for Interexchange Carriers and major customers.
2. I graduated from Texas A&M University in 1990 with a Bachelor of Science degree in Industrial Engineering. I also earned a Master of Science degree in Industrial Engineering from the University of Oklahoma in 1997. I have 4 years experience in the telecommunications industry, all of it with SBC Communications. I have held several management positions with Southwestern Bell Telephone Company ("SWBT") and Ameritech, including positions in central office management, account management, interconnection negotiations, and special services.

PURPOSE AND BACKGROUND

3. In the Ameritech region, CLECs place orders to obtain wholesale products and services using Local Service Requests ("LSRs") or Access Service Requests ("ASRs"). The requests are sent to Ameritech's Local Service Center ("LSC"). CLEC orders for Resale POTS ("plain old telephone service") and UNE-P flow to the normal Ameritech POTS provisioning processes. CLEC orders for POTS unbundled loops, DSL, LNP, and ISDN BRI flow from the LSC to Ameritech's Local Operations Center ("LOC"). As described in the Affidavit of

Justin Brown ("the Brown affidavit"), the LSC/LOC maintains centralized supervision and oversight of the provisioning process performed by the Ameritech Network Services Organization for these products and services.

4. CLECs also send orders to the LSC for designed telecommunications circuits, including, for example, high capacity unbundled network elements (DS1 and above, also called high capacity or "hicap" products). These orders for high capacity products then flow from the LSC to the Special Services group (rather than to the LOC) in the Network Services Organization, which is responsible for provisioning these CLEC "hicap" product orders.

5. The purpose of my affidavit is to describe how the Special Services group provisions, maintains, and repairs high capacity telecommunications products for CLECs across its five-state region, including the area served by the Illinois Bell Telephone Company ("Ameritech").[1] Specifically, I provide a brief overview of the central office, engineering and construction, and installation and repair functions in the Ameritech Network Services Organization. Then, I describe the Special Services group's functions within the Network Services Organization, including the systems and processes it uses to provision and maintain high capacity products for CLECs in the five Ameritech states, including Illinois. As described in the overview, Ameritech provides these high capacity products to its CLEC customers in a nondiscriminatory manner, using the same provisioning and maintenance processes that are used to provide service to Ameritech's own retail operations. The affidavits of Messrs. Alexander and Deere describe Ameritech's legal obligations and the

[1] Illinois Bell Telephone Company, an Illinois corporation, is a wholly owned subsidiary of Ameritech Corporation, which owns the former Bell operating companies in the states of Michigan, Illinois, Wisconsin, Indiana, and Ohio. Ameritech Corporation is a wholly owned subsidiary of SBC Communications Inc. Illinois Bell offers telecommunications services and operates under the names "Ameritech" and "Ameritech Illinois" pursuant to assumed name filings with the state of Illinois.

circumstances in which hicap products are provided. My affidavit addresses the processes and procedures used to fulfill those obligations.

AMERITECH NETWORK SERVICES-GENERAL OVERVIEW

6. Ameritech provides high capacity products to both retail and wholesale customers through the Network Services Organization. This business unit is responsible for performing the provisioning, maintenance, and repair of high capacity customer services within the five Ameritech states. There is no difference in the manner in which Ameritech provides high capacity products to CLEC customers as opposed to its retail customers or other wholesale customers.

7. The Ameritech Network Services Organization is a business unit which operates as an integrated functional team of employees reporting to one corporate officer, the President of the Ameritech Network Services Organization, who in turn reports to the President of Ameritech. Network employees are organized into common work functions under that officer. These work functions are defined and managed independent of the customer being served, i.e. retail or wholesale customers. The three main work functions of the Network Services Organization are defined as central office operations, engineering and construction, and installation and maintenance. The Network Operations, Engineering and Construction, and Installation and Repair organizations are responsible for carrying out these work functions in the Ameritech region. Within each work function, employees are trained and assigned to a particular job function/sub-process. Typically, a work group is responsible for either POTS services or for Special Services offerings (products and services that require specific transmission parameters over and above those required for POTS). In a few instances in the Ameritech region, *e.g.*, rural areas served by smaller work groups, teams are

assigned responsibility for both POTS and Special Services; however, this joint responsibility is never the case in Illinois.

8. The **Network Operations** organization is responsible for the central office portion of the installation, maintenance, and repair of Ameritech's switching and transport facilities and networks, as well as installation, maintenance, and repair of customer services supported by switching and transport equipment and networks. Within Network Operations, there is one team responsible for all of these functions in the Ameritech region. Within this team, work functions are further divided into line-operations functions and centralized-control functions. The line-operation functions are performed by technicians and managers who complete wiring connections and set options in the central offices as required to provide customer services and to maintain Ameritech's switching equipment. The centralized-control functions include network monitoring activities and the dispatching of trouble reports and work orders. In order to optimize locally-developed expertise and to maintain operational consistency throughout the Ameritech region, director level managers from Network Operations meet regularly to discuss issues encountered by the central office organization and develop regional solutions, e.g. common methods and procedures.
9. The responsibilities of the **Engineering and Construction** organization include monitoring, planning, designing, scheduling, and constructing the Ameritech infrastructure and distribution network. It is a single five-state organization within the Network Services Organization, which is further divided into six geographic territories within the Ameritech region. The line functions are performed by both the engineers and support personnel who monitor, plan and design the infrastructure and distribution network, as well as the managers and technicians who schedule, construct, splice and turn-up the network.

10. The **Installation and Repair ("I&R")** organization is responsible for the installation, repair, and maintenance of customer services related to POTS. The I&R organization is divided into teams that support line functions and centralized-control functions. The I&R line functions are performed by technicians and managers that directly install and maintain customer and company services. I&R employees and line functions are organized geographically within the Ameritech region. I&R line operations employees work within a specific geographic area, such as a smaller section of a city or county. I&R centralized control functions include workload monitoring and the tracking and dispatching of customer trouble reports. Job functions performed by the I&R centralized control function employees cover a broad geographical area that incorporates multiple line organizations.
11. In addition to the Ameritech Network organizations described above, **SBC's Network Services** organization is responsible for developing the policies, methods, and procedures used by the Network organizations throughout SBC's thirteen states, including the five Ameritech states. SBC's Network Services Organization plays a key role in ensuring that network processes and procedures are developed in accordance with all industry, regulatory, and contractual requirements, and are documented properly. This organization is also responsible for developing and delivering appropriate training materials to the individual Network Services Organizations within the thirteen SBC states. Training materials are developed using common methods and procedures to ensure consistency in format and content across all SBC states. Materials are presented to the Ameritech Network Service Organization employees by the state training organizations.

AMERITECH NETWORK SERVICES—SPECIAL SERVICES GROUP

12. **Special Services** is another team within Ameritech's Network Services Organization and is responsible for the installation, repair, and maintenance of all designed telecommunications circuits, including both low speed (less than DS1, also called "subrate") and high speed (DS1 and above) circuits. Prior to April 2001, the work force responsible for these functions was organized into separate subrate and hicap departments. However, all employees responsible for the Special Service work functions have since been consolidated into an organization under the leadership of the Vice-President of Special Services. Employees are now assigned to departments within the Special Services organization that provision and maintain high capacity circuits, including the Hicap Provisioning Center ("HPC"), the Digital Operations Group ("DOG"), and the Interexchange Control Center ("IECC").
13. There are ten centers within the Ameritech region that are responsible for designing and maintaining facility records used for Special Services. Each center is assigned either a low speed (less than DS1) or high capacity (DS1 and greater) functional responsibility. The low speed functions are served by four Circuit Provisioning Centers ("CPC") in the Ameritech region. The high-speed functions are served by six Hicap Provisioning Centers ("HPC"). The HPCs that serve the Ameritech region are located in Chicago, IL, Springfield, IL, Waukesha, WI, Indianapolis, IN, Cleveland, OH, and Southfield, MI.
14. The **Digital Operations Group** ("DOG") includes the managers and technicians who perform the field and customer premise work for the installation, repair, and maintenance of hicap products.

15. There are two Interexchange Control Centers ("IECC"), one located in Detroit, Michigan, and the other in Chicago, Illinois, that track and dispatch all CLEC Special Service orders and Special Service trouble tickets for all five Ameritech states. Before April 2001, there were two separate centers (called Hicap Control Centers or "HCC") that performed these functions based upon customer locations. HCC-East, located in Detroit, handled customers in Wisconsin, Ohio, and Michigan. HCC-West, located in Chicago, handled customers in Illinois and Indiana. Under the new structure, the centers are assigned customers based upon volumes. The Chicago IECC handles Special Services orders and trouble tickets for a particular carrier with a high volume of hicap services. The IECC in Detroit handles the Special Services activity for all other CLECs.

OPERATIONAL SUPPORT SYSTEMS

16. Ameritech uses the same operational support systems ("OSS") throughout its five-state territory. The Network Services Organization uses a suite of systems including the following:

- **SOAC (**Service Order Analysis & Control): Parses service orders into assignment requests which for high capacity services it sends to the TIRKS system for design in the HPC.
- The **TIRKS®** System: A number of mechanized conversion, interim, and ongoing inventory and assignment systems for facility equipment and circuit information used in trunks and Special Services operations.
- **WFA/C** (Work and Force Administration / Control): Directs and tracks the flow of work items to WFA/DI and WFA/DO. WFA/C facilitates communication between the WFA systems and external systems.

- **WFA/DO (**Work and Force Administration / Dispatch Out): Loads, prioritizes, and schedules work assignments of outside POTS and Special Services installation and maintenance technicians, and provides on-line tracking and status of work requests and technicians.
- **WFA/DI** (Work and Force Administration / Dispatch In): Loads, prioritizes, and schedules work assignments of central office technicians, and provides on-line tracking and status of work requests and technicians.
- **NSDB** (Network Services Database): Stores data received from the TIRKS system and SOAC system, distributes data to operations systems such as WFA/C, and receives completions and updates from WFA/C.

17. Ameritech does not own these systems, but instead leases them from outside vendors. Because the Ameritech five-state region represents the "old," pre-divestiture, Wisconsin, Michigan, Illinois, Ohio, and Indiana Bell Telephone Companies, many of these systems have been in use on a five-state region basis for over 20 years. Although many upgrades have been implemented during that time, these systems have matured with the business and have served as the foundation for a uniform and systematic method of doing business. As new products and services have developed, such as those provided to CLECs, these systems continue to serve their intended purpose of providing a uniform and systematic method of provisioning. Any changes to the underlying program code on these systems must be negotiated with the vendors. This negotiation is the responsibility of the centralized SBC Network Services staff. Ameritech uses a common version of each application, which handles CLEC and Ameritech service orders on a nondiscriminatory basis throughout the five states. The managers and technicians in the Network Services Organization also use the

systems in the same manner, as defined in the training and methods and procedures produced by the centralized SBC Network Services staff.

AMERITECH PROVISIONING FLOW FOR SPECIAL SERVICES

18. Ameritech uses a common provisioning flow for each product across its five-state territory. This section addresses only the portion of the hicap provisioning flow beginning with issuance of an order by the LSC and ending when the provisioning and/or maintenance and repair work for hicap products is completed. Information pertaining to the OSS interfaces used and the LSC processes that take place before and after provisioning these hicap products is provided in the Cottrell and Brown affidavits.

19. The Special Services provisioning process begins when the Hicap Provisioning Center ("HPC") receives a customer order in the TIRKS system from the LSC via the SOAC system. The HPC first performs a facility check in the TIRKS system to determine if there are sufficient copper and/or fiber facilities to provision the requested circuit. If such facilities are not found to be available in the TIRKS system's inventory, then the order is passed to an Outside Plant Engineer ("OSPE") in the Engineering and Construction organization to determine if other facilities are in place that could serve the order. If facilities still cannot be found, then the OSPE will return the order to the LSC and have them contact the customer. Depending upon the type of modifications required, the customer must then decide whether to cancel the order or to authorize Ameritech to perform construction of the needed facilities, for which they will be charged as appropriate. Once facilities are available (either built or found available in inventory), the HPC will design the service. The procedures for facility modification have been the subject of extensive discussion with CLECs, and the agreed upon procedures are described further in the affidavit of William Deere.

20. The HPC uses the TIRKS system to design facilities for Special Services orders. This design is then passed to the WFA system, which creates the appropriate work steps for the Network Operations, DOG, and the Interexchange Control Center ("IECC") forces to perform the actual provisioning. The Network Operations forces use the work document from WFA and the methods and procedures developed by the centralized staff to install the service in the central office. These functions include wiring the circuit, setting options in equipment, and testing the service. The WFA/DI system is used to track the progress of orders throughout the central office provisioning process. The DOG forces also use the work document from WFA and the methods and procedures developed by the centralized staff to install the service in the field and at the customer premise. These functions also include wiring the circuit, setting options in equipment, and testing the service. The WFA/DO system is used to track the progress of orders throughout the DOG provisioning process. Work steps are also created in WFA/C for the IECC, which is the center ultimately responsible for the provisioning of the order, to monitor and track the completion of the order.
21. Upon completion of the work step(s) by the Network Operations and DOG forces, WFA/DI and WFA/DO send a completion transaction to WFA/C. The IECC then works with the CLEC to test the circuit, confirm the CLEC's acceptance of the service, and close out the order. Once closed, the order is posted to the various systems to complete the process.
22. The provisioning process described above is the same regardless of the type of customer requesting service, i.e. wholesale (including CLEC or access) or retail customers.

AMERITECH MAINTENANCE FLOW FOR SPECIAL SERVICES

23. Ameritech uses a common maintenance flow for each product across its five-state territory. The UNE and Special Services maintenance process begins when the customer contacts

Ameritech via telephone or uses electronic bonding to initiate a trouble report. A trouble ticket is created in WFA/C and flows to the IECC for handling. The IECC is the organization ultimately responsible for the testing, analysis, dispatch, and resolution of the trouble report.

24. From the IECC, the trouble ticket flows to the local serving office in the Network Operations organization for testing and isolation of the trouble. The WFA/DI system is used to track the trouble ticket while in the central office. If the trouble can be isolated and repaired in the central office, the Network Operations team completes the necessary tasks and closes the trouble ticket. In other situations, testing may indicate that the trouble is in the field. In this scenario, Network Operations refers the trouble ticket to the DOG team for investigation. The WFA/DO system is used to track the trouble ticket while it is being handled by the DOG.
25. In some situations cable repair may be required to close a ticket in the field. In those cases the DOG team will refer the ticket to the I&R organization to perform the cable repair work.
26. The Network Operations, DOG, and I&R forces are trained to use established common methods and procedures to investigate the trouble condition and to isolate and correct the problem. The WFA/DI and WFA/DO systems are used to dispatch and track the trouble report throughout the life of the report. Once the problem is resolved, the trouble report is closed in WFA/DI or WFA/DO and passed to WFA/C. The IECC monitors the status of the trouble report through WFA/C and notifies the customer when the trouble is resolved.

CONCLUSION

27. Ameritech uses the same methods, procedures, systems, and process flows across all five Ameritech states. These same processes, systems, and methods are used in all lines of business – retail and wholesale.

This concludes my affidavit.

DRAFT

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on _____, 2001.

_____

Patrick L. Foster

Director of Operations Support for Special Services

STATE OF ILLINOIS
COUNTY OF COOK

Subscribed and sworn to before me
this ___ day of _____, 2001.

_____

Notary Public

My commission expires: